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11 Attorneys for Defendant
12 OLD REPUBLIC NATIONAL TITLE INSURANCE
13 COMPANY

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

DEUTSCHE BANK NATIONAL TRUST
COMPANY, AS INDENTURE TRUSTEE
FOR AMERICAN HOME MORTGAGE
INVESTMENT TRUST 2007-1,

Plaintiff,

vs.

OLD REPUBLIC TITLE INSURANCE
GROUP, INC., et al.,

Defendants.

Case No.: 3:20-cv-00535-MMD-CLB

**STIPULATION AND PROPOSED
ORDER EXTENDING DEFENDANT
OLD REPUBLIC NATIONAL TITLE
INSURANCE COMPANY'S TIME TO
RESPOND TO DEUTSCHE BANK'S
OPPOSITION TO OLD REPUBLIC
NATIONAL TITLE INSURANCE
COMPANY'S MOTION TO DISMISS
[ECF No. 38]**

(Second Request)

COMES NOW Defendant Old Republic National Title Insurance Company (“Old Republic”) and Plaintiff Deutsche Bank National Trust Company, as Indenture Trustee for American Home Mortgage Investment Trust 2007-1 (“Deutsche Bank”) (collectively, the “Parties”), by and through their counsel of record, hereby stipulate and agree as follows:

1. On November 3, 2020, Old Republic filed a Motion to Dismiss [ECF No. 12];
2. On December 23, 2020, Deutsche Bank filed its response in opposition to Old Republic’s motion to dismiss [ECF No. 38];
3. On December 29, 2020, the Court granted Old Republic’s request for a brief extension of time to file the aforementioned reply memorandum, through and including January 13, 2021 [ECF No. 41];
4. Old Republic’s deadline to file its reply memorandum responsive to Deutsche Bank’s opposition to Old Republic’s motion to dismiss is currently January 13, 2021;
5. Old Republic’s counsel is requesting a brief extension of time to file the aforementioned reply memorandum, through and including January 20, 2021, to afford Old Republic’s counsel additional time to review, analyze, and respond to the legal arguments set forth in Deutsche Bank’s brief;
6. Deutsche Bank does not oppose the requested extension;
7. This is the second request for an extension which is made in good faith and not for purposes of delay;

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1 **IT IS SO STIPULATED** that Old Republic's deadline to respond to Deutsche Bank's
2 opposition to Old Republic's motion to dismiss [ECF No. 38] is hereby extended through and
3 including January 20, 2021.

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5 Dated: January 11, 2021

EARLY SULLIVAN WRIGHT
GIZER & McRAE LLP

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7 By: /s/-- Sophia S. Lau
8 SCOTT E. GIZER
9 SOPHIA S. LAU
Attorneys for Defendant OLD REPUBLIC
NATIONAL TITLE INSURANCE COMPANY

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11 Dated: January 11, 2021

WRIGHT FINLAY & ZAK, LLP

12 By: /s/-Lindsay D. Robbins
13 DARREN T. BRENNER
14 LINDSAY D. ROBBINS
Attorneys for Plaintiff DEUTSCHE BANK
NATIONAL TRUST COMPANY

15 **IT IS SO ORDERED:**

16
17 Dated: January 11, 2021

18 By: 
19 MIRANDA M. DU
20 CHIEF UNITED STATES DISTRICT
21 JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on January 11, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the Electronic Service List for this Case.

I declare under penalty of perjury under the laws of the United State of America that the foregoing is true and correct.

/s/ D'Metria Bolden

D'METRIA BOLDEN
An Employee of EARLY SULLIVAN
WRIGHT GIZER & McRAE LLP

